

June 7, 2020

Jane B. Jacobs
Partner
Klein Zelman Rothermel Jacobs & Schess LLP
485 Madison Avenue, 13th Floor
New York, NY 10022

Ms. Jacobs:

Please see Discovery Disputes on Production Documents

Please provide the requested information. In addition,

Please provide the Dispute documents by June 13, 2020

I will requesting Court to remove Mr. Campsen to having any contact with me due to his Abusive and Harassing behavior.

Thanks

Plaintiff Production Documents Disputes

Plaintiff's Request	Production Document 1	Teneo's Response	Plaintiff's Dispute
1	All documents that evidence, refer, or relate to Plaintiff's employment by Defendant for the entire period of his employment, including but not limited to, performance evaluations, warning or discipline letters, payroll records, grievances or complaints, including responses, if any, from employment, and business diaries and calendars.	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to this document request as overbroad and not seeking information relevant to the Plaintiff's claims asserted in the Amended Complaint. Teneo objects to this document request as imposing an undue burden on Teneo and not proportional to the needs of the case. Without waiving these or other objections, Teneo will produce non-privileged documents relevant to this matter.	<p>This is not a Burdon – A Legal Hold was send out on 8/17/19 to Ms. . Head. This is no burden Objection to Teneo.</p> <ol style="list-style-type: none"> 1) Performance Reports are missing from 2016 – June 2017 – three performances 2) If no formal warning was given to Plaintiff then Teneo will not have a Warning letter – otherwise state not warning letter was issued to Plaintiff. 3) If no formal grievance was filed and was the Plaintiff was notified if not state Plaintiff was not notified 4) If no formal complaints was filed state there is no formal Complaint

			<p>was filed and Plaintiff was not notified</p> <p>5) Provide formal faces and responses to Plaintiff if not identify</p> <p>Please identify provided documents response to this request</p>
2	<p>All documents from the past 10 years relating to any previous grievances, legal actions, complaints of race, religion, age, hostile work environment, sexual harassment, ethnicity discrimination brought against Defendant from January 1, 2009 – January 1, 2010</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to this document request as not seeking information relevant to the Plaintiff's claims asserted in the Amended Complaint. Teneo objects to this document request as imposing an undue burden on Teneo and not proportional to the needs of the case. Teneo objects to this document to the extent it seeks information in the control, custody or possession of third-parties.</p>	<p>Plaintiff Dispute it is not Burdon to Teneo</p> <p>Provide any previous grievances, legal actions, complaints of race, religion, age, hostile work environment, sexual harassment, ethnicity discrimination brought against Defendant from January 1, 2009 – January 1, 2010</p> <p>Please identify provided documents response to this request</p>
7	<p>Any and all documents, excluding those made to your attorneys as “work product” reflecting any investigation into the subject matter of the allegations of Plaintiff's complaint filed in this case.</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will produce all non-privileged documents relevant to this matter</p>	<p>Please identify provided documents response to this request</p>
8	<p>Provide copies of any and all correspondence between Defendant officials, supervisors, managers, persons from Human Resources, or other employees, pertaining to the</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will produce all non-privileged documents relevant to this matter</p>	<p>Please identify provided documents response to this request</p>

	subject matter of Plaintiff's complaint.		
9	To the extent not already provided, all written communications in the company's possession regarding or involving Plaintiff.	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to this document request as duplicative. Without waiving this or other objections, Teneo will produce all non-privileged documents relevant to this matter	Please identify provided documents response to this request
11	1. All documents that contain information that Defendant or its agents, counsel, employees or other authorized persons have provided to other persons or governmental agencies (including the Equal Employment Opportunity Commission) that pertain to the allegations of Plaintiff's complaint, including any documents such agency may have provided to the Defendant. Memorandum.	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to this document request as duplicative. Without waiving these or other objections, Teneo will provide non-privileged documents relevant to this request.	Please provide requested information Please identify provided documents response to this request
18	Any document, memorandum, email, etc. that in any way references: complaints against Asad Gilani (a) personnel changes made in the between September 12, 2016 to the present;	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to this document request to the extent it seeks confidential information regarding Teneo employees. Teneo objects to this document request as duplicative. Teneo objects to this document request as seeking information not relevant to	Please provide requested information Please identify provided documents response to this request

	<p>(b) Asad Gilani; termination;</p> <p>(c) complaints against Plaintiff;</p> <p>(d) Plaintiff's termination;</p> <p>(e) any discrimination complaint made by any employee.</p>	Plaintiff's claims in the Amended Complaint and not proportional to his needs in this matter. Plaintiff objects to this document request as containing multiple document requests.	
19	1. Provide all documents and evidence in response to the statement made by defendants "Charging raised his claims just on the cusp of his termination" to EEOC Position statement by Defendants Provide evidence the date when Defendants Communicated to Plaintiff."	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will provide all non-privileged responsive documents.	Please provide requested information Please identify provided documents response to this request
23	Provide all documents and evidence in response to the statement made by defendants "He had a long and problematic history of undermining his manager and colleague" to EEOC Position statement by Defendants Provide evidence the date when Defendants Communicated to Plaintiff."	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will provide all non-privileged responsive documents.	Please provide requested information Please identify provided documents response to this request

24	<p>Provide all documents and evidence in response to the statement made by defendants “Teneo’s employees complete a 3-month orientation program which includes explanations and discussions on Teneo’s core values and the way these values inform behavior and conduct in the workplace. Reference is made to Teneo’s Employee Handbook and, in particular, to Teneo’s harassment, bullying, equal opportunity, and discrimination policies” to EEOC Position statement by Defendants Provide evidence the date when Defendants Communicated and Plaintiff was trained. NY Mandated Sexual Discrimination and Harassment Mandate” Identify the certificate of Plaintiff submitted to state of New York.</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Teneo objects to the request to “Provide evidence for each employee name and date when they were trained on US federal law on Discrimination and Age Policies/” as seeking confidential information regarding Teneo employees, irrelevant to Plaintiff’s claims in the Amended Complaint and not proportional to Plaintiff’s needs in this matter. Without waiving this or other objections, Teneo will provide all non-privileged responsive documents to the request: “Teneo’s employees complete a 3-month orientation program which includes explanations and discussions on Teneo’s core values and the way these values inform behavior and conduct in the workplace. Reference is made to Teneo’s Employee Handbook and, in particular, to Teneo’s harassment, bullying, equal opportunity, and discrimination policies” to EEOC Position statement by Defendants.”</p>	<p>Identify each document in response to this request documents and NY mandated certificate</p>
	<p>Provide all documents and evidence in response to the statement made by defendants “Working with the entire sales team to identify potential customers and understand customer business and network needs • Meeting with customers to develop technical relationships • Presenting</p>		<p>Please provide requested information Please identify provided documents response to this request</p>

	and demonstrating all of Teneo's mainstream product offerings • Installing and managing customer technology trials “” to EEOC Position statement by Defendants Provide evidence of the job description identified above in Position statement.		
25	Provide all documents and evidence in response to the statement made by defendants “ “” to EEOC Position statement by Defendants Provide evidence and communication to Plaintiff that Plaintiff was reporting to Brett Ayers as of October 18, 2018.	Teneo objects to this document request as duplicative, confusing and seeking information irrelevant to Plaintiff's claim in the Amended complaint	Please provide requested information Please identify provided documents response to this request
28	Provide all documents and evidence in response to the statement made by defendants “ “” to EEOC Position statement by Defendants Provide evidence and communication to Plaintiff that Plaintiff was reporting to Brett Ayers as of October 18, 2018.	Teneo objects to this document request as incomplete and confusing. Without waiving these or other objections, Teneo will produce all non-privileged documents relevant to Mr. Ayers supervision of Plaintiff. PLAINTIFF ISSUE: These interrogations are addressed to Piers Carey not to Rachel Head Please have Piers Carey respond to each Interrogatories	Please provide requested information Please identify provided documents response to this request
29	Provide all documents and evidence in response to the statement made by defendants “Charging Party proved to be a difficult person for Mr. Evans	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other	Please provide requested information Please identify provided documents response to this request

	to manage throughout his time at Teneo. On many occasions Mr. Evans had reason to reprimand Charging Party for being argumentative, confrontational and rude to him and to colleagues; unprofessional in verbal and written communications; insubordinate; careless, inaccurate and casual; negative and disparaging about Teneo to colleagues and on social media platforms; displaying disloyalty to Teneo; and being disrespectful to partners “” to EEOC Position statement by Defendants Provide evidence documents of each allegation above.	objections, Teneo will provide non-privileged relevant document to the extent not already produced	
29	Provide all documents and evidence who brought Canaccord Genuity as a Customer for Teneo. Provide Master Agreement with Canaccord Genuity.	Teneo objects to this document request as incomplete and confusing. Without waiving these or other objections, Teneo will produce all non-privileged documents relevant to Mr. Ayers supervision of Plaintiff.	This is not an intergrotires Please provide requested information Please identify provided documents response to this request
30	Provide all documents and evidence in response to the statement made by defendants “Charging Party proved to be a difficult person for Mr. Evans to manage throughout his time at Teneo. On many occasions Mr. Evans had reason to reprimand Charging Party for being argumentative, confrontational and	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrines. Without waiting this or other objections. Teneo will provide non-privileged relevant documentation to the extend not already products	This information was provided to EEOC Defendants needs to provide the facts Please provide requested information Please identify provided documents response to this request

	<p>rude to him and to colleagues; unprofessional in verbal and written communications; insubordinate; careless, inaccurate and casual; negative and disparaging about Teneo to colleagues and on social media platforms; displaying disloyalty to Teneo; and being disrespectful to partners “” to EEOC Position statement by Defendants Provide evidence documents of each allegation above.</p>		
31	<p>Provide all documents and evidence in response to the statement made by defendants “Mr. Malone was told by one of Teneo’s partners, Silver Peak, that they were finding it very difficult to work with Charging Party and that he was being negative about their technology “” to EEOC Position statement by Defendants Provide evidence documents of each allegation above. Provide each and every documents and name of the person and what was the reason.</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will provide non-privileged relevant document to the extent not already produced.</p>	<p>Please provide requested information Please identify provided documents response to this request</p>
32	<p>Provide all documents and evidence in response to the statement made by defendants “Mr. Malone was told by one of Teneo’s partners, Silver Peak, that they were finding it very difficult</p>	<p>Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will provide non-privileged</p>	<p>Please provide requested information Please identify provided documents response to this request</p>

	to work with Charging Party and that he was being negative about their technology "" to EEOC Position statement by Defendants Provide evidence documents of each allegation above. Provide each and every documents and name of the person and what was the reason	relevant document to the extent not already produced.	
35	Provide all documents and evidence in response to the statement made by defendants "Additionally, at the same time, one of Teneo's vendors, Riverbed, reported to Mr. Evans that Charging Party had told him that he was setting up to compete with Teneo."	Teneo objects to this document request to the extent it seeks information covered by the attorney-client privilege or work-product doctrine. Without waiving this or other objections, Teneo will provide non-privileged relevant document to the extent not already produced	Please provide requested information Please identify provided documents response to this request
37	Provide Performance Plan and exit Interview of Rose Neas, Zoltan Szentgyorgyi, Nick Malone.	Teneo objects to this document request as seeking confidential employee information. Teneo further objects to this document request as seeking information irrelevant to Plaintiff's claims in the Amended Complaint and not proportional to his needs in this matter	Please provide requested information Please identify provided documents response to this request
40	Provide each and every EXHIBIT in Complaint Plaintiff Submitted in Amended complaint.	Teneo objects to this document request as unduly burdensome because Plaintiff is currently in possession of the documents sought in this request.	Please provide requested information Please identify provided documents response to this request

